

**Federal Defenders
OF NEW YORK, INC.**

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March 21, 2023

By ECF and by e-mail

Honorable Ronnie Abrams
Honorable Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
March 21, 2023

Re: *United States v. Chris Cindy Pena*, 21 Cr. 513 (RA)

Dear Judges Abrams and Netburn:

I write on consent (Pretrial Services Officer Dayshawn Bostic) to respectfully request that the Court modify Ms. Pena's conditions of pretrial release by expanding her travel restrictions to include the continental United States. Ms. Pena has begun working for a company that sells solar panels, and her position may require travel outside of New York State and New Jersey. Ms. Pena will still be required to notify Pretrial Services of any out-of-state travel, but the condition will allow Pretrial Services to approve the travel without further recourse to the Court. The Government – per Assistant U.S. Attorney Kaylan Lasky – defers to the position of Pretrial Services.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Martin S. Cohen
Ass't Federal Defender
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cc. Kaylan Lasky, Esq., by ECF and by e-mail
Dayshawn Bostic, by e-mail